



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

November 27, 2015

Federal Emergency Management Agency
c/o Mark Eberlein, Regional Environmental Officer
130 – 228th Street SW
Bothell, Washington 98021

Dear Mr. Eberlein:

We have reviewed the Federal Emergency Management Agency's October 2015 Final Environmental Impact Statement (FEIS) for the Southern Flow Corridor Project, Tillamook County, Oregon (EPA Region 10 Project Number: 14-0023-FEM).

We support this project primarily because restoring 522 acres of tidal wetlands and associated fish and wildlife habitat would have major, long-term beneficial effects on wildlife and threatened and endangered species, including the threatened Coastal Coho salmon. Also, as previously stated, we believe that emphasis on achieving both flood risk reduction and environmental benefits is consistent with federal agencies', including FEMA's, responsibilities to the Tillamook Bay Comprehensive Management Plan; which the EPA has approved under the Federal Clean Water Act.

In our comments on the Draft EIS, we recommended additional adaptive management information because of the nature and number of physical, social and economic factors relating to project success.

The FEIS's new section 3.4.2.2. Maintenance, Monitoring, and Adaptive Management is responsive to our recommendation for additional adaptive management information. Section 3.4.2.2 is responsive to our interest in likely topics and/or concepts for key performance standards because it identifies vegetation as a critical component for evaluating success. Section 3.4.2.2 is responsive to our interest in potential management responses because it states that parameters performing outside of a range would trigger "...a discussion between project partners...", and a potential management response would be "...control of invasive species..."¹ Section 3.4.2.2 is responsive to our interest in responsible parties because it identifies Tillamook County and the Port of Tillamook Bay as the primary responsible parties for implementation.

Moving forward, we understand that Tillamook County and the Port of Tillamook Bay would develop a maintenance and monitoring plan as a condition of their grants that will include performance standards and adaptive management components. To continue to help strengthen this project's overall planning process - including environmental review, grants, construction permits and approvals - we recommend that the Record of Decision include - to the extent possible - additional details on performance standards and management responses. Currently, for example, neither the FEIS nor the 2014 *Southern Flow*

¹ FEIS, p. 3-22

Corridor Project Effectiveness Monitoring Plan identifies quantitative performance standards for vegetation - a critical component for evaluating success. With regard to management responses, no timeline for project partner discussions or decisions is presented.

We would also like to take this opportunity to recommend a useful tool for identifying and managing risks associated with climate change, the EPA's August 2014 *Being Prepared for Climate Change: A Workbook for Developing Risk-Based Adaptation Plans*. This workbook, and other resources on the EPA's Climate Ready Estuaries website (<http://www2.epa.gov/cre>), could be referenced in the Record of Decision as guidance for conducting a risk-based climate change vulnerability assessments and developing action plans. The workbook is an ideal tool for organizations that manage places, watersheds or coastal environments.

Thank you for this opportunity to comment and if you have any questions please contact me at (206) 553-1601 or by electronic mail at littleton.christine@epa.gov, or you may contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Littleton". The signature is written in a cursive, flowing style.

Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit